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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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ANUCHA BROWNE SANDERS,

Plaintiff,
-against- 06 CV 0589 (GEL)
MADISON SQUARE GARDEN, L.P.,
ISIAH LORD THOMAS, III and JAMES L. DOLAN,
Defendants.

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VIDEOTAPED DEPOSITION OF RUTH BROWNE
New York, New York
Tuesday, January 16, 2007

REPORTED BY:
BARBARA R. ZELTMAN
JOB NO.: 11464

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2 Q And was Scott Layden the other
3 witness?

4 A Yes.

5 Q And how do you know that?

6 A My sister told me.

7 Q Has Anucha Browne Sanders ever
8 told you the extent of her relationship
9 with Faye Brown in terms of how good of a
10 friend she considers her to be?

11 MS. CACACE: Objection to
12 form.

13 A No.

14 Q Did she tell you how it was
15 that Faye Brown and Scott Layden came to
16 be the witnesses on her mother's will?

17 MS. CACACE: Objection to
18 form.

19 A Yes.

20 Q And what did she tell you?

21 A That the lawyers were coming
22 to the hospital to give my mother the will
23 to sign and that they needed witnesses.
24 And Anucha was going to the hospital and
25 because they needed witnesses, she needed

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2 to bring two people with her to be
3 witnesses to the will.

4 Q And so she asked Faye Brown
5 and Scott Layden to accompany her for that
6 purpose?

7 A That's my understanding.

8 Q How has she described her
9 relationship with Faye Brown to you?

10 MS. CACACE: Objection to
11 form.

12 A She hasn't described it in any
13 specific way.

14 Q Regardless of whether it's
15 specific or not, what statements has she
16 made to you about Faye Brown?

17 MS. CACACE: Objection to
18 form.

19 A She thought Faye Brown was a
20 good assistant. She liked her.

21 Q Has she told you that she's
22 talked to Faye Brown since the time of her
23 termination from Madison Square Garden?

24 A No.

25 Q What about Scott Layden, has